

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

ERIC PRESCOTT KAY

No. 4:20-CR-269-Y

**GOVERNMENT’S UNOPPOSED MOTION FOR
LEAVE TO FILE AMENDED WITNESS LIST**

The government respectfully requests permission from the Court to file an amended witness list to reflect the correct division and to include one additional witness, that is Special Agent Geoffrey Lindenberg—Drug Enforcement Administration, for potential testimony regarding witness interviews and investigative steps. The government does not anticipate needing to call SA Lindenberg, but seeks to include him on the witness list out of an abundance of caution.¹ The government has attempted to reach stipulations and agreements with respect to witnesses and exhibits in this case. While no stipulations or agreements have been reached, the government has spoken with counsel for the defendant and anticipates meeting to confer with respect to reaching stipulations and agreements following the final pretrial conference.

¹ The government provided its witness list to the defendant and the Court on February 1, 2022. Following the Court’s Order to file the witness list on February 3, 2022, the government filed its witness list in compliance with the Order.

Respectfully submitted,

CHAD E. MEACHAM
United States Attorney

s/ Lindsey Beran

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CERTIFICATE OF CONFERENCE

I certify that counsel for the government contacted Reagan Wynn, counsel for defendant Eric Kay, on February 6, 2022, regarding his position on this motion and he indicated that he is not opposed to the relief requested in this motion.

s/ Lindsey Beran

Lindsey Beran

Assistant United States Attorney